

REMARKS/ARGUMENTS

In the Office Action mailed December 27, 2007, claims 1-8 and 10-25 were rejected. In response, Applicants hereby request reconsideration of the application in view of the amended claims and the below-provided remarks. No claims are added or canceled.

For reference, proposed amendments are presented for claims 1, 5, 7, 10, 11, and 25. In particular, proposed amendments are presented for claims 1, 5, 7, 10, and 11 to clarify an operation to copy a first working data structure in a memory space. Additionally, the proposed amendments for claims 5, 7, and 11 clarify an operation to convert the copy of the first working data structure to a file data structure. The amendments of claims 1, 5, 7, 10, and 11 are supported, for example, by the subject matter described in the specification at page 16, lines 11-26, and page 17, lines 1-15. The proposed amendment for claim 25 merely addresses the formatting of the claim language.

Response to Claim Rejections under 102 and 103

Claims 1-8 and 10-15 were rejected under 35 U.S.C. 103(a) as being unpatentable over Stockdale et al. (U.S. Pat. No. 6,804,763, hereinafter Stockdale) in view of Cheng et al. (U.S. Pat. No. 5,701,516, hereinafter Cheng). Additionally, claims 16-25 were rejected under 35 U.S.C. 103(a) as being unpatentable over Stockdale, in view of Cheng, as applied to claims 11 and 14, and further in view of Lee et al. (U.S. Pat. No. 5,930,167, hereinafter Lee). However, Applicants respectfully submit that these claims are patentable over Stockdale, Cheng, and Lee for the reasons provided below.

Independent Claims 1, 5, 7, 10, and 11

Claim 1, including the proposed amendment, recites, “a memory allocation unit adapted to communicate with at least one application device and to allocate at least one first part of said memory space to said application device to write a first working data structure comprising a plurality of working data blocks to the memory space and to write a second working data structure comprising a copy of the plurality of working data blocks, wherein the second working data structure comprises a copy of the first working

data structure in the same memory space as the first working data structure” (emphasis added). Claims 5, 7, 10, and 11 recite similar limitations.

Applicants submit that neither Stockdale, Cheng, nor Lee teaches at least the aforementioned limitation of independent claim 1. The Office Action concedes that Stockdale and Cheng do not teach copying a first data working structure in the same memory space as the first working data structure. Office Action, page 11. Nonetheless, the Office Action rejects independent claim 1, contending that Lee teaches copying a first working data structure in the same memory space as the first working data structure. Office Action, page 11. This contention is respectfully traversed.

Lee relates to storing a data file on an Electrically Erasable Programmable Read Only Memory (EEPROM) device. Lee, col. 5, line 60, to col. 6, line 6. However, Lee does not teach making a copy of an original data file in the same memory space as the original data file. Instead, Lee is concerned with increasing the number of bits stored per cell of an EEPROM by increasing the number of states per cell. Lee, col. 1, lines 6-41. In particular, Lee teaches that conventional EEPROMs store 1 bit per cell, since a conventional EEPROM cell has two states: a 0-state for bits with a value of 0, and a 1-state for bits with a value of 1. Lee, col. 1, lines 16-18. Lee also teaches that two or more bits are stored per cell when four or more states are programmed per cell. Thus, Lee does not teach copying the data file when he refers to storing a single data file in two or more states per cell of an EEPROM. Instead, Lee teaches that a data file is first stored in a conventional EEPROM with two-state cells, or 1 bit per cell, and then stored in an EEPROM with four-state cells, or 2 bits per cell. Lee, col. 6, lines 20-23, figs. 4A-4D. These appear to be two separate EEPROMs—one with two-state cells and the other with four-state cells. Since Lee does not teach a memory allocation unit “to write a second working data structure comprising a copy of the plurality of working data blocks, wherein the second working data structure comprises a copy of the first working data structure in the same memory space as the first working data structure,” Applicants respectfully assert claims 1, 5, 7, 10, and 11 are not taught by Lee. Accordingly, Applicants respectfully assert claims 1, 5, 7, 10, and 11 are patentable over Stockdale, Cheng, and Lee because the cited references do not teach copying a first working data structure on the same memory space as the first working data structure.

Claim 5, including the proposed amendment, also recites a file system device “to convert a copy of a first working data structure to a file data structure and to write the file data structure to a secondary storage medium, wherein the copy of the first working data structure is written to a same memory space as the first working data structure” (emphasis added). Claims 7 and 11 recite similar limitations.

Applicants submit that neither Stockdale, Cheng, nor Lee teaches at least the aforementioned limitation of independent claim 5. The Office Action concedes that Stockdale and Cheng do not teach converting a copy of a first working data structure to a file data structure in the same memory space as the first working data structure. Office Action, page 12. Nonetheless, the Office Action rejects independent claim 5, contending that Lee teaches converting a copy of a first working data structure to a file data structure. Office Action, page 13. This contention is respectfully traversed.

Lee relates to compressing a data file on an Electrically Erasable Programmable Read Only Memory (EEPROM) device by using an EEPROM programmed with multiple states per cell. Lee, col. 5, line 60, to col. 6, line 6. However, Lee does not teach converting a copy of an original data file from a working data structure to a file data structure in the same memory space as the original data file. Instead, Lee is concerned with increasing the number of bits stored per cell by increasing the number of states programmed per cell, and thereby, compressing the data file. Lee, col. 1, lines 6-41, col. 6, lines 20-23. Thus, Lee does not teach converting the file structure of the data file from a working data structure to a file data structure. Moreover, Lee does not teach converting a copy of a first working data structure to a file data structure. Instead, Lee teaches that a data file is compressed by storing a data file in an EEPROM that is programmed with four or more states per cell. Since Lee does not teach “A file system device to convert a copy of a first working data structure to a file data structure and to write the file data structure to a secondary storage medium, wherein the copy of the first working data structure is written to a same memory space as the first working data structure,” Applicants respectfully assert claims 5, 7, and 11 are not taught by Lee. In fact, Lee appears to be silent in regard to converting a copy of a working data structure into a file data structure. Accordingly, Applicants respectfully assert claims 5, 7, and 11 are patentable over Stockdale, Cheng, and Lee because the cited references do not teach

converting a copy of a first working data structure on the same memory space as the first working data structure.

Dependent Claims 2-4, 6, 8, and 12-25

Claims 2-4, 6, 8, and 12-25 depend from and incorporate all of the limitations of the corresponding independent claims 1, 5, 7, and 11. Applicants respectfully assert claims 2-4, 6, 8, and 12-25 are allowable based on allowable base claims. Additionally, each of claims 2-4, 6, 8, and 12-25 may be allowable for further reasons.

CONCLUSION

Applicants respectfully request reconsideration of the claims in view of the proposed amendments and remarks made herein. A notice of allowance is earnestly solicited.

At any time during the pendency of this application, please charge any fees required or credit any over payment to Deposit Account **50-3444** pursuant to 37 C.F.R. 1.25. Additionally, please charge any fees to Deposit Account **50-3444** under 37 C.F.R. 1.16, 1.17, 1.19, 1.20 and 1.21.

Respectfully submitted,

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